

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DOVER LIMITED,	:
	:
	: 08 CV 1337 (LTS)(JCF)
	:
Plaintiff,	:
	:
-against-	:
	: <b>JOINDER OF DEFENDANTS</b>
	: <b>DELBERT D. REICHARDT,</b>
ALAIN ASSEMI, HARTSFIELD CAPITAL	:
SECURITIES, INC., HARTSFIELD CAPITAL	: <b>JOHN H. BANZAF and</b>
GROUP, STEPHEN J. LOVETT,	: <b>HARTSFIELD CAPITAL</b>
JOHN H. BANZAF, DELBERT D. REICHARDT,	: <b>SECURITIES, INC. TO</b>
MANSELL CAPITAL PARTNERS, LLC,	: <b>MOTION TO DISMISS</b>
THOMAS O. BEGLEY & ASSOCIATES,	: <b>FILED BY DEFENDANTS</b>
TJ MORROW and TJ MORROW PC,	: <b>THOMAS O. BEGLEY,</b>
	: <b>THOMAS O. BEGLEY &amp;</b>
	: <b>ASSOCIATES,</b>
	: <b>STEPHEN J. LOVETT and</b>
Defendants.	: <b>HARTSFIELD CAPITAL</b>
	: <b>GROUP</b>
	:
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1. Defendants Delbert D. Reichardt, John H. Banzaf and Hartsfield Capital Securities, Inc. ("HCS Defendants") join in the motion to dismiss or, in the alternative, for a change of venue to the Northern District of Georgia filed with this Court on June 13, 2008 by co-defendants Thomas O. Begley, Thomas O. Begley & Associates, Stephen J. Lovett and Hartsfield Capital Group (the "HCG Defendants").

2. The HCS Defendants submit for the Court's consideration affidavits from Delbert D. Reichardt and John H. Banzaf, both dated June 17, 2008, annexed hereto as exhibits A and B, respectively, in further support of the HCG Defendants' pending motion to dismiss the complaint or change the venue of this action to the Northern District of Georgia.

3. The HCS Defendants respectfully request that this Court dismiss the complaint filed by the Plaintiff in this action, or, in the alternative, transfer this action to

the District Court of the Northern District of Georgia for the same reasons set forth in the June 13, 2008 motion, and the accompanying memorandum of law, filed by the HCG Defendants in this action.

Dated: New York, New York  
June 19, 2008

EISENBERG TANCHUM & LEVY  
*Attorneys for Defendants Delbert D.  
Reichardt, John H. Banzaf and  
Hartsfield Securities, Inc.*

By:   
Stewart L. Levy (SL-2892)  
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New York, New York 10017  
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DOVER LIMITED,

Plaintiff,

-against-

ALAIN ASSEMI, HARTSFIELD CAPITAL  
SECURITIES, INC., HARTSFIELD CAPITAL  
GROUP, STEPHEN J. LOVETT,  
JOHN H. BANZAF, DELBERT D. REICHARDT,  
MANSELL CAPITAL PARTNERS, LLC,  
THOMAS O. BEGLEY & ASSOCIATES,  
TJ MORROW and TJ MORROW PC,

Defendants.  
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: 08 CV 1337 (LTS)(JCF)  
:

: **AFFIDAVIT OF**  
: **DELBERT D. REICHARDT**

STATE OF GEORGIA       )  
                                  ) SS.  
COUNTY OF FULTON     )

DELBERT D. REICHARDT, being duly sworn, deposes and says:

1. I am one of the defendants in this action and am fully familiar with the facts set forth in this affidavit.

2. I am Executive Vice-President of Argosy Capital Securities, Inc. ("Argosy"), formerly known as Hartsfield Capital Securities, Inc. ("HCS").

3. Argosy, as well as HCS, is or was, respectively, a Georgia corporation engaged in the business of providing financial services primarily to institutional investors.

4. HCS began, sometime early in 1998, when I, together with John H. Banzhaf had discussions with Mr. Steve Lovett, President of Hartsfield Capital Group,

with respect to the formation of a broker-dealer to provide broker-dealer services to clients of Hartsfield Capital Group and to others.

5. As a result, in 1998, I and John H. Banzhaf founded HCS, as a separate entity, with the intent of providing certain broker-dealer services to clients of Hartsfield Capital Group and to others.

6. I have not resided in the State of New York since 1971.

7. While, HCS (or Argosy) has been registered to conduct the securities business in the State of New York, no business has been done there, and neither I nor HCS (or Argosy) conduct any business in the State of New York.

8. Neither I nor HCS (or Argosy) maintain any bank accounts in the State of New York or solicit any business in the State of New York.

9. Neither I nor HCS (or Argosy) maintain any offices or presence in the State of New York.

10. Neither I nor HCS (or Argosy) have committed any act in the State of New York relating to the claims alleged by Plaintiff in its Complaint. I have never met TJ Morrow nor have I had any dealings with him or his company.

11. Specifically, in its Complaint, the Plaintiff references a business meeting in New York. I neither attended nor participated in that meeting in any fashion.

12. Neither I nor HCS (or Argosy) have committed any act outside the State of New York that could have injured any party or property located in the State of New York.

13. Neither I nor HCS (or Argosy) have any continuous or systematic contacts with the State of New York. All securities trades executed on the New York Stock

Exchange are conducted by our clearing firm located in Omaha, Nebraska.

Sworn to before me this  
17<sup>th</sup> day of June, 2008

  
Notary Public

**Nadia Simmon**  
Notary Public, Cobb County Georgia  
My Commission Expires June 6 2011



  
Delbert Reichardt



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GROUP, STEPHEN J. LOVETT,	:
JOHN H. BANZAF, DELBERT D. REICHARDT,	:
MANSELL CAPITAL PARTNERS, LLC,	:
THOMAS O. BEGLEY & ASSOCIATES,	:
TJ MORROW and TJ MORROW PC,	:
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	:
Defendants.	:
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08 CV 1337 (LTS)(JCF)

**AFFIDAVIT OF  
JOHN H. BANZAF**

STATE OF GEORGIA       )  
                                  ) SS.  
COUNTY OF FULTON     )

JOHN H. BANZAF, being duly sworn, deposes and says:

1. I am one of the defendants in this action and am fully familiar with the facts set forth in this affidavit.

2. I am the President and Chief Executive Officer of Argosy Capital Securities, Inc. ("Argosy"), formerly known as Hartsfield Capital Securities, Inc. ("HCS").

3. Argosy, as well as HCS, is or was, respectively, a Georgia corporation engaged in the business of providing financial services primarily to institutional investors.

4. HCS began, sometime early in 1998, when I, along with Delbert D. Reichardt, had discussions with Mr. Steve Lovett, President of Hartsfield Capital Group,



with respect to the formation of a broker-dealer to provide broker-dealer services to clients of Hartsfield Capital Group and others.

5. As a result, in 1998, I and Delbert D. Reichardt founded HCS, as a separate entity, with the intent of providing certain broker-dealer services to clients of Hartsfield Capital Group and others.

6. Other than the fact that HCS has leased office space from Hartsfield Capital Group, HCS has no legal relationship with Hartsfield Capital Group whatsoever.

7. In response to one of the Plaintiff's allegations, HCS never had an agreement with the Plaintiff to provide investment services, nor has it ever received investments from Plaintiff.

8. I have never resided in the State of New York

9. While HCS (or Argosy) has been registered to do business in the State of New York, it has never done so, and neither I nor HCS (or Argosy) conduct any business in the State of New York.

10. Neither I nor HCS (or Argosy) maintain any bank accounts in the State of New York or solicit any business in the State of New York.

11. Neither I nor HCS (or Argosy) maintain any offices or presence in the State of New York.

12. Neither I nor HCS (or Argosy) have committed any act in New York relating to the claims alleged by Plaintiff in its Complaint. I have never met TJ Morrow or had any dealings with him or his company.

13. Specifically, in its Complaint, the Plaintiff references a business meeting in New York. I neither attended nor participated in that meeting in any fashion.

14. Neither I nor HCS (or Argosy) have committed any act outside New York that could have injured any party or property located in the State of New York.

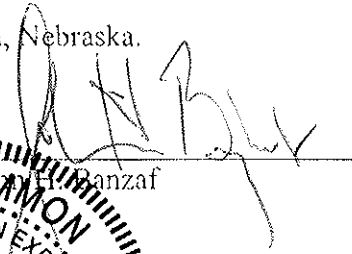
15. Neither I nor HCS (or Argosy) have any continuous or systematic contacts with the State of New York. All securities trades executed on the New York Stock Exchange are conducted by our clearing firm in Omaha, Nebraska.

Sworn to before me this  
17<sup>th</sup> day of June, 2008

  
Notary Public

**Nadia Simon**  
**Notary Public, Cobb County Georgia**  
**My Commission Expires June 6 2011**



  
J. H. Banzaf